

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ZACK KAPLAN, BEN KAPLAN,  
MICHAEL KAPLAN, ELI KAPLAN, and  
MICHAEL MAZZOTTA, Individually  
and on Behalf of Themselves and All  
Others Similarly Situated,

Plaintiffs,

v.

ALEXANDER MASHINSKY,  
SHLOMI “DANIEL” LEON, HANOCH  
GOLDSTEIN, HARUMI URATA-  
THOMPSON, JEREMIE BEAUDRY,  
KRISTINE MASHINSKY, AM  
VENTURES HOLDING, INC.,  
KOALA1 LLC, and WINTERMUTE  
TRADING LTD.,

Defendants.

**The Honorable Susan D. Wigenton**

Civ No. 22-04560-SDW-SDA

**[PROPOSED] ORDER GRANTING THE MOVING DEFENDANTS’  
MOTION TO TRANSFER TO THE U.S. DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK**

**THIS MATTER** having been brought before this Court by Harumi Urata-Thompson, through Jamie Hoxie Solano, Esq., Eric S. Rosen, Esq., and Constantine Economides, Esq., of Dynamis LLP; Alexander Mashinsky, appearing *pro se*; Jeremie Beaudry, through Thaddeus D. Wilson, Esq., and Kevin J. O’Brien, Esq., of King and Spalding LLP; and Kristine Meehan, through Leigh M.

Nathanson, Esq. of King and Spalding LLP (collectively, “Moving Defendants”), for entry of an Order transferring this matter to the United States District Court for the Southern District of New York; and this Court having reviewed the Moving Defendants’ submissions, the arguments and materials submitted in opposition, the relevant legal authorities, and for good cause shown:

**IT IS HEREBY ORDERED** that the Motion to Transfer to the U.S. District Court for the Southern District of New York is **GRANTED**; and it is

**FURTHER ORDERED** that the Clerk shall take all actions necessary to promptly effect the transfer of this action to the U.S. District Court for the Southern District of New York; and it is

**FURTHER ORDERED** that all motions and matters currently pending before this Court shall be held in abeyance, and all deadline for responding shall be extended pending the completion of the transfer to the U.S. District Court for the Southern District of New York

**SO ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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The Honorable Susan D. Wigenton  
United States District Judge